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JASON EDWARD THOMAS CARDIFF

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 JASON EDWARD THOMAS
16 CARDIFF,

17 Defendant.

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Declaration of
Stephen G. Larson and [Proposed]
Order]*

EX PARTE APPLICATION

Jason Cardiff has requested that counsel file this *ex parte* application seeking permission to travel to Ireland for ten days, and for the return of his passport to permit that travel.

Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include, among other conditions: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral.

Mr. Cardiff is living with Attorney Cochell in Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

On July 20, 2024, Mr. Cardiff reported that his wife suffered a medical issue while she was in Slovakia. Mr. Cardiff provided photographs of a medical bill, a printout of an EKG reading, and a one-page health assessment. The documents are in Slovakian. The documents were uploaded to Google Translate and appear to show that Mrs. Cardiff obtained medical treatment at the Emergency Health Service in Bratislava, Slovakia on July 20, 2024. Mr. Cardiff reported that Mrs. Cardiff intends to seek additional medical treatment in Ireland, where she resides. Because of this medical issue, Mr. Cardiff seeks permission to travel to Ireland to assist his wife and care for their 10-year-old child. Mr. Cardiff proposes that he travel to Ireland for ten days and that his flight and itinerary be approved by Officer Sherrod before he leaves the country.

Sureties Lilia Murphy and Brian Kennedy do not oppose this request.

Probation Officer Sherrod advised that he does not oppose this request, noting that Mr. Cardiff has been compliant with supervision and has not had any

1 monitoring violations. Officer Sherrod does, however, request that the curfew be
2 lifted during the travel, explaining that it would be logistically difficult to enforce a
3 curfew in a different time zone.

4 Department of Justice Trial Attorney Manu Sebastian indicated that the
5 government objects to this request in part because Mr. Cardiff is a citizen of Ireland
6 and this creates issues for the government in guaranteeing that he will return. The
7 government intends to request that this be heard on an *ex parte* basis because it
8 needs time to make its argument and provide the Court with the entirety of the
9 record.

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11 Dated: July 22, 2024

LARSON LLP

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13 By: /s/ Stephen G. Larson

14 Stephen G. Larson
15 Hilary Potashner
Jonathan Gershon

16 Attorneys for Defendant
17 JASON EDWARD THOMAS CARDIFF
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